

NOTICE OF OBJECTION TO CONFIRMATION

AMERIHOM MORTGAGE COMPANY, LLC has filed papers with the Court to object to the Confirmation of the Chapter 13 Modified Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to object to the Confirmation of the Chapter 13 Modified Plan, or if you want the Court to consider your views on the Objection, then on or before, you or your attorney must:

1. File with the Court an answer, explaining your position at:
- 2.

**Clerk
U.S. Bankruptcy Court
402 E. State Street
Trenton, NJ 08608**

If you mail your response to the Court for filing, you must mail it early enough so that the Court will *receive* it on or before the date stated above.

You must also mail a copy to:

Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103

ALBERT RUSSO, Trustee
CN 4853, SUITE 101
TRENTON, NJ 08650

3. Attend the hearing scheduled to be held on 04/23/2019 in the TRENTON Bankruptcy Court, at the following address:
- 4.

**U.S. Bankruptcy Court
402 E. State Street
Trenton, NJ 08608**

If you or your attorney do not make these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an Order granting that relief.

Date: March 15, 2019

/s/ Robert J. Davidow
Robert J. Davidow, Esq.
Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
Tel: 856-813-5500 Ext. 47960
Fax: 856-813-5501
Email: Robert.Davidow@phelanhallinan.com

File No. 822667

Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard
Philadelphia, PA 19103
856-813-5500
FAX Number 856-813-5501
AMERIHOM MORTGAGE COMPANY, LLC

In Re:

BRUCE ALLEN LATSHAW
JENNIFER SUE LATSHAW

Debtors

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON VICINAGE

Chapter 13

Case No. 18-24502 - MBK

Hearing Date: 04/23/2019

The undersigned, Phelan Hallinan Diamond & Jones, PC, attorneys for Secured Creditor, AMERIHOM MORTGAGE COMPANY, LLC, the holder of a Mortgage on Debtors' residence located at 406 FAIRFIELD WAY, NEPTUNE, NJ 07753 hereby objects to the Confirmation of the Debtors' proposed Chapter 13 Modified Plan on the following grounds:

1. Movant is AMERIHOM MORTGAGE COMPANY, LLC.
2. Debtors, BRUCE ALLEN LATSHAW and JENNIFER SUE LATSHAW are the owners of the property located at 406 FAIRFIELD WAY, NEPTUNE, NJ 07753.
3. On September 28, 2018, Movant filed Proof of Claim listing pre-petition arrears in the amount of \$7,176.69.
4. Debtors' Modified Plan fails to cure the delinquency pursuant to 11 U.S.C. §1322(b)(5).
5. Debtors' Modified Plan currently provides for payment to Movant in the amount of \$23,542.79. This amount consists of pre-petition arrears in the amount of \$12,959.74 and post-petition arrears in the amount of \$10,583.05.
6. Movant objects to Debtors' attempt to cure post-petition arrears through the Debtors' Modified Plan without the agreement of Movant.

7. Debtors' Plan should be amended to fully fund and pay the pre-petition arrears owed to Movant. Confirmation of Debtors' proposed Plan should be denied.

WHEREFORE, AMERIHOM MORTGAGE COMPANY, LLC respectfully requests that the Confirmation of Debtors' Modified Plan be denied.

/s/ Robert J. Davidow
Robert J. Davidow, Esq.
Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
Tel: 856-813-5500 Ext. 47960
Fax: 856-813-5501
Email: Robert.Davidow@phelanhallinan.com

Dated: March 15, 2019

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

822667
Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
856-813-5500
Attorneys for AMERIHOM MORTGAGE
COMPANY, LLC

In Re:

Bruce Allen Latshaw
Jennifer Sue Latshaw

Case No: 18-24502 - MBK

Hearing Date: 04/23/2019

Judge: MICHAEL B KAPLAN

Chapter: 13

CERTIFICATION OF SERVICE

1. I, Jason Seidman:

☐ represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Phelan Hallinan Diamond & Jones, PC, who represents AMERIHOM MORTGAGE COMPANY, LLC in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On March 15, 2019 I sent a copy of the following pleadings and/or documents to the parties listed below:

Objection to Modified Plan

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: March 15, 2019

/s/ Jason Seidman
Jason Seidman

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Bruce Allen Latshaw 406 Fairfield Way, Neptune, NJ 07753	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Jennifer Sue Latshaw 406 Fairfield Way, Neptune, NJ 07753	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
William H. Oliver, Jr., Esquire 2240 State Highway 33 Suite 112 Neptune, NJ 07753	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Albert Russo, Trustee Cn 4853 Suite 101	Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail

Trenton, NJ 08650		<input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
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* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.